

EXHIBIT A

Case Number 2020L 001775

Date: 12/17/2020 2:07 PM

Thomas McRae

Clerk of Circuit Court

Third Judicial Circuit, Madison County Illinois

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
COUNTY OF MADISON**

TYRONE TAYLOR,)
)
)
Plaintiff,)
)
) No. 20-L-
vs.)
)
CASEY'S GENERAL STORES, INC.)
And CASEY'S RETAIL COMPANY,)
)
Defendants.)

2020L 001775

COMPLAINT

Plaintiff, Tyrone Taylor, by his attorneys, Darr Law Offices, Ltd., complains of the defendants, Casey's General Stores, Inc. and Casey's Retail Company, as follows:

COUNT I – CASEY'S GENERAL STORES, INC.

1. Plaintiff is a resident and citizen of the State of Illinois. He resides in Madison County, Illinois.
2. Defendant, Casey's General Stores, Inc., is a foreign corporation. Upon information and belief, defendant, owned, managed, maintained and otherwise operated the facility located at 211 N. Bluff Road, Collinsville, Illinois. It otherwise does business in this county.
3. On or about October 29, 2020, the plaintiff was lawfully on defendant's premises for the purpose of patronizing the store located at 211 N. Bluff Road, Collinsville, Illinois.
4. Plaintiff parked his pick-up truck in the dedicated area of the defendant's parking lot. As he exited his vehicle, he stepped into which is apparently a one-time

drainage ditch that currently serves no useful purpose, and fell, injuring his right ankle, knee and shoulder.

5. At all times mentioned herein, the defendant owed or assumed a duty to keep its premises in a reasonably safe condition for the use of its customers.

6. On and before October 29, 2020, defendant breached the duty to maintain its premises in a reasonably safe condition by way of one or more of the following negligent acts and/or omissions:

- a) failed to remove or fill the drainage ditch or canal; and/or
- b) failed to adequately warn of the trip hazard; and/or
- c) failed to place a grate or cover over the depressed area of the drainage ditch; and/or
- d) improperly designed its parking lot; and/or
- e) failed to create, institute and enforce protocols for the identification and eradication of dangerous conditions; and/or
- f) failed to provide safe ingress and egress to its customers; and/or
- g) other matters of negligence to be documented through discovery.

7. That as a direct and proximate result of one or more of the aforementioned acts of negligence by the defendant, plaintiff fell and injured right ankle, knee and shoulder.

8. That as a proximate result of the aforementioned occurrence, plaintiff did incur medical and surgical expenses in the past and is reasonably certain to incur additional medical expenses in the future.

9. Plaintiff has experienced pain and has become disabled due to the events described herein. His pain and disabilities are permanent in nature.

WHEREFORE, plaintiff, Tyrone Taylor, prays for judgment against the defendant, Casey's General Stores, Inc., in an amount in excess of Fifty Thousand Dollars (\$50,000); plus costs of suit.

COUNT II – CASEY'S RETAIL COMPANY

1. Plaintiff is a resident and citizen of the State of Illinois. He resides in Madison County, Illinois.

2. Defendant, Casey's Retail Company, is a foreign corporation. Upon information and belief, defendant, owned, managed, maintained and otherwise operated the facility located at 211 N. Bluff Road, Collinsville, Illinois. It otherwise does business in this county.

7. On or about October 29, 2020, the plaintiff was lawfully on defendant's premises for the purpose of patronizing the store located at 211 N. Bluff Road, Collinsville, Illinois.

8. Plaintiff parked his pick-up truck in the dedicated area of the defendant's parking lot. As he exited his vehicle, he stepped into which is apparently a one-time drainage ditch that currently serves no useful purpose, and fell, injuring his right ankle, knee and shoulder.

9. At all times mentioned herein, the defendant owed or assumed a duty to keep its premises in a reasonably safe condition for the use of its customers.

10. On and before October 29, 2020, defendant breached the duty to maintain its premises in a reasonably safe condition by way of one or more of the following negligent acts and/or omissions:

- a) failed to remove or fill the drainage ditch or canal; and/or

- b) failed to adequately warn of the trip hazard; and/or
- c) failed to place a grate or cover over the depressed area of the drainage ditch; and/or
- d) improperly designed its parking lot; and/or
- e) failed to create, institute and enforce protocols for the identification and eradication of dangerous conditions; and/or
- f) failed to provide safe ingress and egress to its customers; and/or
- g) other matters of negligence to be documented through discovery.

7. That as a direct and proximate result of one or more of the aforementioned acts of negligence by the defendant, plaintiff fell and injured right ankle, knee and shoulder.

8. That as a proximate result of the aforementioned occurrence, plaintiff did incur medical and surgical expenses in the past and is reasonably certain to incur additional medical expenses in the future.

9. Plaintiff has experienced pain and has become disabled due to the events described herein. His pain and disabilities are permanent in nature.

WHEREFORE, plaintiff, Tyrone Taylor, prays for judgment against the defendant, Casey's Retail Company, in an amount in excess of Fifty Thousand Dollars (\$50,000); plus costs of suit.

By: /s/Lanny Darr
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Service by facsimile transmission or via email will be accepted at the stated facsimile and/or email stated above.